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tion of these awards, the determination of the beneficiaries and their shares should not be left to possibly divergent decisions upon varying statutes, but should be uniform throughout the the country.

FREDERICK J. BROWN.

Errata should be noted in *Blagge v. Balch* (162 U. S.) as follows (beside the mistake in assigning the *Leffingwell* case to the Baltimore County Court, as above mentioned): On page 455, for "22 C. Cl., 721," read "22 C. Cl., 1;" on page 464, for "2 Jarman on Wills (5th ed.), *108, *109," read 2 Jarman on Wills (5th Lond. ed.), *1008, *1009;" in *Gardner v. Clark* (20 D. C.), on page 263, for "45; Legal Intelligencer, 478," read "45 Phila. Leg. Int., 474;" in *Clement's Estate* (150 Pa.), on page 86, for "448 Leg. Int., 474," read "48 Phila. Leg. Int., 474."

Vide also *Guy v. Baltimore*, 100 U. S. 434 (reversing Baltimore City Court), *Hanley v. Donoghue*. 116 U. S. 1 (reversing Court of Appeals of Maryland). Also

Article on Voidable and Void Judgments, 19 American Law Register (N. S.) 673 (1880). (See same subject continued in 32 Am. Law Reg. and Review, 213 (1893) and in *Freeman on Judgments*, 4th Ed., Sec. 557).

Brief note on Windfalls 20 Am. Law Reg. (N. S.) 392 (1881).